

SB215 Unfavorable
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I oppose SB215 and request the committee to report this bill as unfavorable.

The On-site Consumption concept originally was supposed to provide a safe place for residents of low income neighborhoods to consume Cannabis when they were not likely to be allowed to consume in their own residences. We seem to have forgotten that need. This plan for on-site consumption licenses and events only serves the wealthy.

The Cannabis community is scared that this will apply to events where they want to consume their own Cannabis. Can you assure us that this bill will have no effect on events that are open to the public where Cannabis is only shared not sold? Can you amend this bill to prohibit counties from banning events where Cannabis is only consumed (not sold) on private property?

The proposed fee structure makes small events < 1000 people too costly. The proposed event fee for retailers equates to a maximum of \$2.50/ person attending the event whether they buy any Cannabis or not. That is highway robbery. The event fee should be based on event sales.

This bill bans consumers from bringing their own Cannabis to events and bans them from taking any Cannabis they paid for at the event home with them. Who is going to enforce this and how? To borrow a phrase, this one has problems coming and going.

This bill bans smoking and vaping at Cannabis events. Smoking and vaping represent 60-70% of Cannabis consumption. That should be a red flag. Events should allow patio smoking of Cannabis in jurisdictions where tobacco smoking would otherwise be allowed.

This bill allows normal edibles to be sold at large events. This virtually guarantees hospital visits because a large number of first time users will be a certainty. Although this specific issue is easily addressed by regulation it is a red flag that the concept has not been thought through. Normal edibles have a 45-60+ minute onset time. Experienced users will not pay a premium to consume onsite when they can consume at home and not feel the effects until the game starts versus not feeling the effects until the second half or on the way home.

Dosing normal edibles is very difficult with onset times of 45 minutes to an hour. At 5mg doses, many people will need multiple servings to feel the effects. That's a recipe for people taking too much.

There are green waste concerns. Safe handling is going to be difficult, expensive and error prone. We should consider allowing consumers to take home partially consumed single dose Cannabis to reduce green waste?

This approach deviates from the alcohol model in that permits are issued at the state level instead of at the county level. I support moving the permitting process to the County level.

For all these reasons, it is clear that this concept needs more work before it can best serve the needs of the Cannabis consumer.

Thank you,
Rusty Carr